

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

)
In re:) Chapter 13
)
)
Robin Lynn Carpenter,)
)
)
Debtor.) Case No. 15-30124-KRH
)

**MOTION TO WITHDRAW OBJECTION TO
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

Michael Averett ("Mr. Averett"), by counsel, hereby files his Motion to Withdraw Objection to Confirmation of Debtor's Chapter 13 Plan (the "Motion") and in support thereof respectfully represents:

1. On January 9, 2015, Robin Lynn Carpenter (the "Debtor") filed a voluntary petition for relief under chapter 13 of the Bankruptcy Code.
2. On August 19, 2015, Mr. Averett filed an Objection to Confirmation of Debtor's Chapter 13 Plan (Docket No. 32) (the "Objection").
3. Mr. Averett has decided for reasons unrelated to the merits of the Objection, including the expense of litigation, to withdraw the same.
4. Therefore, Mr. Averett hereby moves for withdrawal of the Objection.

WHEREFORE, Michael Averett, for the reasons stated herein, hereby moves the Court for entry of an order withdrawing the Objection to Confirmation of Debtor's Chapter 13 Plan and for such other and further relief as the Court deems just and proper.

Neil E. McCullagh, Esq. (VSB No. 39027)
Spotts Fain PC
411 East Franklin Street, Suite 600
Richmond, Virginia 23219
Telephone: (804) 697-2000
Facsimile: (804) 697-2100
Counsel for Michael Averett

DATED: October 2, 2015

MICHAEL AVERETT

By: /s/ Neil E. McCullagh
Counsel

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2015, a copy of the foregoing was served by first class mail, postage prepaid, on all necessary parties, who are as follows:

Robin Lynn Carpenter
12505 Toll House Rd.
Spotsylvania, VA 22551-8134

Robert Easterling
2217 Princess Anne St., Ste. 100-2
Fredericksburg, VA 22401

Susan Hope Call
Chapter 13 Trustee's Office
919 East Main Street, Ste. 1601
P.O. Box 1819
Richmond, VA 23218

/s/ Neil E. McCullagh